UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS (BOSTON DIVISION)

CASE NO. 17-CR-10265

UNITED STATES OF AMERICA,	:
Plaintiff,	:
	:
V.	:
	:
SALLY ANN JOHNSON,	:
Defendant.	:
	:

MOTION FOR PERMISSION TO TRAVEL

The Defendant, SALLY ANN JOHNSON, through undersigned counsel, respectfully requests that this Honorable Court grant her permission to travel to Winston-Salem, North Carolina, from Friday, February 14, 2020, to Monday, March 2, 2020. In support, Ms. Johnson states as follows:

- 1. Ms. Johnson was sentenced on January 17, 2018, to 26 months imprisonment followed by supervised release for a year. (DE 24). Ms. Johnson has been released by the Bureau of Prisons and is currently on supervised release. She is in compliance with all terms and conditions of her supervised release.
- 2. Ms. Johnson's daughter is scheduled to have a Cesarean section on Friday, February 14, 2020. Ms. Johnson requests permission to attend the medical procedure with her daughter as well as to help her daughter when she is released from the hospital. Accordingly, Ms. Johnson requests permission to travel to Winston-Salem,

North Carolina, via vehicle from Friday, February 14, 2020, to Monday, March 2, 2020.¹

Undersigned conferred with the Assistant United States Attorney assigned to this matter who advised that she has no opposition as long as Ms. Johnson's probation officer had no opposition. Undersigned contacted Ms. Johnson's probation officer and left a message. However, the probation officer has not returned undersigned's call.

WHEREFORE, the Defendant, SALLY ANN JOHNSON, through undersigned counsel, respectfully requests that this Honorable Court grant her permission to travel to Winston-Salem, North Carolina, from Friday, February 14, 2020, to Monday, March 2, 2020.

Respectfully submitted,

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By: s/ Paul Petruzzi
PAUL D. PETRUZZI, ESQ.
Florida Bar No. 982059

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 14, 2020, a true and correct copy of the foregoing was furnished by CM/ECF to all counsel of record.

By: <u>s/ Paul Petruzzi</u> **PAUL D. PETRUZZI, ESQ.**Attorney for Defendant

¹ Ms. Johnson will be staying with her daughter while there. She will provide her probation officer with all her travel information.